

*KIRTON LAW FIRM*

---

*Marlon G. Kirton, Esq.*

---

*Nassau County:  
175 Fulton Avenue, Suite 305  
Hempstead, New York 11550  
Tel. # (516) 833-5617  
Fax # (516) 833-5620*

December 24, 2020

VIA ELECTRONIC FILING

Honorable Paul G. Gardephe  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** December 28, 2020

Re: *United States v. Alexei Saab, 19 cr. 676 (PGG)*

Dear Judge Gardephe:

I represent Alexei Saab in the above-referenced matter. The second round of defense pretrial motions is due on or before January 5, 2021. The defense requests a two-week extension to January 19, 2021, to file the motions. This is the first request for an extension.

There are factual components to the motion that are still being processed, and the defense needs additional time to complete this analysis. These matters will be complete during the first two weeks of January 2021. In addition, the defense requests an extension of the Government's response date to February 19, 2020, and an extension of the defense reply date to March 4, 2021. All other dates will remain the same. I have the consent of the Government for this request.

Please contact me if you have any questions or concerns.

Sincerely,

s/Marlon G. Kirton  
Marlon G. Kirton, Esq.

cc: Jessica Fender, Assistant United States Attorney (via electronic mail)  
Michael Krouse, Assistant United States Attorney (via electronic mail)

Jason Richman, Assistant United States Attorney (via electronic mail)  
Esere Onadowan, Esq. (via electronic mail)